

# **Exhibit D**



**From:** heather.choi@bakerbotts.com  
**Sent:** Monday, August 17, 2015 6:34 PM  
**To:** Ronnie Spiegel  
**Cc:** Jeniphr Breckenridge  
**Subject:** Re: Auto Parts - Honda  
**Attachments:** image001.jpg; image002.png; image003.png

Hi Ronnie,

Will 5 pm eastern time work for you?

Heather

On Aug 17, 2015, at 7:23 PM, Ronnie Spiegel <[ronnie@hbsslaw.com](mailto:ronnie@hbsslaw.com)> wrote:

Hi Heather,

We are co-point people for Honda. Do you have time to speak tomorrow to touch base, and to set our plan for making initial contact with Honda counsel? Is there a time that will work best for you?

Thanks,

Ronnie

**Ronnie Spiegel** | Partner

**Hagens Berman Sobol Shapiro LLP**

1918 Eighth Ave Suite 3300 - Seattle, WA 98101

Direct: (206) 268-9343

[ronnie@hbsslaw.com](mailto:ronnie@hbsslaw.com) | [www.hbsslaw.com](http://www.hbsslaw.com) | [HBSS Blog](#)



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**From:** heather.choi@bakerbotts.com  
**Sent:** Tuesday, August 18, 2015 3:47 PM  
**To:** Ronnie Spiegel  
**Subject:** RE: OEM Assignments and Plan for Moving Forward

Ronnie,

I'm back at my desk if you want to chat a little early.

Heather

**Heather Souder Choi**

Senior Associate

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**From:** owner-oem\_subpoenas@LISTS.SUSMANGODFREY.COM [mailto:owner-oem\_subpoenas@LISTS.SUSMANGODFREY.COM] **On Behalf Of** Ronnie Spiegel  
**Sent:** Monday, August 17, 2015 12:57 PM  
**To:** OEM\_Subpoenas@lists.susmangodfrey.com  
**Subject:** OEM Assignments and Plan for Moving Forward

Good morning,

Please find attached the most updated version of the OEM assignment chart. We now have point people for all OEM families (or confirmation that we can go ahead with existing point people). Auto dealers, please advise if you have made any switches since Friday. For most OEMs, we are good to go, and can make our initial calls for introduction, and for scheduling a more substantive call. The point people for each family will need to coordinate on who/how you will reach out. When you decide on who will be the "official" point of contact from your group, please advise and we can add it to the chart. When scheduling the first group/substantive call, please defer to our agreed set call times as the first options

(Monday-Thursday 9 am to 1 pm Pacific). Please also remember to check in with Rob Haegele (HBSS paralegal) before confirming the time with an OEM (to make sure we do not double book). When you confirm a time with an OEM family, please send a notice of the time to the whole group by email. In addition, Rob Haegele can circulate the full calendar for the upcoming week each Friday.

The extension language is also confirmed and can be relayed to the OEMs in the initial call and/or followed up with email or letter confirmation. Please also find attached the full Excel chart of entities with service details and a summary of initial communications, for your convenience.

We are working on drafting talking points for use on our group calls with OEMs, and hope to have something to circulate in a few days.

Best,  
Ronnie

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**From:** heather.choi@bakerbotts.com  
**Sent:** Monday, August 24, 2015 11:11 AM  
**To:** Jeniphr Breckenridge; Ronnie Spiegel  
**Subject:** RE: Auto Parts Litigation - Subpoena

Sure

**Heather Souder Choi**  
Senior Associate

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**From:** Jeniphr Breckenridge [mailto:Jeniphr@hbsslaw.com]  
**Sent:** Monday, August 24, 2015 12:11 PM  
**To:** Choi, Heather; Ronnie Spiegel  
**Subject:** RE: Auto Parts Litigation - Subpoena

1:30 Pacific tomorrow ?

Jeniphr Breckenridge | **Hagens Berman Sobol Shapiro LLP** | Direct: (206) 268-9325

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**From:** [heather.choi@bakerbotts.com](mailto:heather.choi@bakerbotts.com) [mailto:heather.choi@bakerbotts.com]  
**Sent:** Monday, August 24, 2015 9:10 AM  
**To:** Ronnie Spiegel; Jeniphr Breckenridge  
**Subject:** FW: Auto Parts Litigation - Subpoena

Tomorrow is better for me, but I can make today work

**Heather Souder Choi**

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**From:** Justina K. Sessions [<mailto:JSessions@kvn.com>]

**Sent:** Monday, August 24, 2015 12:08 PM

**To:** 'Jeniphr Breckenridge'

**Cc:** Choi, Heather; Ronnie Spiegel

**Subject:** RE: Auto Parts Litigation - Subpoena

Good morning all,

I am available this afternoon after 1:00 Pacific or tomorrow after 1:00 Pacific as well.

Thanks,

Justina

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**From:** Jeniphr Breckenridge [<mailto:Jeniphr@hbsslaw.com>]

**Sent:** Monday, August 24, 2015 9:07 AM

**To:** Justina K. Sessions

**Cc:** [heather.choi@bakerbotts.com](mailto:heather.choi@bakerbotts.com); Ronnie Spiegel

**Subject:** Auto Parts Litigation - Subpoena

Good morning Justine:

We are writing to follow up regarding the subpoenas served on American Honda Motor Company, Inc. and other Honda entities. Heather Choi of Baker Botts, my law partner Ronnie Spiegel, and I will be the point people for discussing the subpoenas on behalf of the serving parties. We would like to set up a time to discuss the subpoena response extension and the immediate schedule and plan going forward.

Please let us know your availability.

Best regards,

Jeniphr

**Jeniphr Breckenridge** | Partner

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**From:** heather.choi@bakerbotts.com  
**Sent:** Tuesday, October 13, 2015 3:42 PM  
**To:** Ronnie Spiegel  
**Subject:** RE: Honda call - attendee confirmation

Heather Choi (Toyoda Gosei Defendants)

**Heather Souder Choi**  
Senior Associate

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**From:** owner-oem\_subpoenas@LISTS.SUSMANGODFREY.COM [mailto:owner-oem\_subpoenas@LISTS.SUSMANGODFREY.COM] **On Behalf Of** Ronnie Spiegel  
**Sent:** Tuesday, October 13, 2015 4:41 PM  
**To:** OEM\_Subpoenas@lists.susmangodfrey.com  
**Subject:** Honda call - attendee confirmation

If you attended the Honda meet and confer today at 1 pm Pacific, please email me so that I can provide an attendance list to Honda.

Thanks,  
Ronnie

**Ronnie Spiegel** | Partner  
**Hagens Berman Sobol Shapiro LLP**  
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**From:** heather.choi@bakerbotts.com  
**Sent:** Monday, October 19, 2015 3:36 PM  
**To:** Ronnie Spiegel; Jeniphr Breckenridge  
**Subject:** RE: honda follow up - draft email

No comments, thank you for taking the lead on this

**Heather Souder Choi**  
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**From:** Ronnie Spiegel [mailto:ronnie@hbsslaw.com]  
**Sent:** Monday, October 19, 2015 3:26 PM  
**To:** Jeniphr Breckenridge; Choi, Heather  
**Subject:** honda follow up - draft email

Please let me know if you have any changes or comments on the email below for Honda counsel.

Hi Tina,

Thank you for taking the time to speak with the serving party group last week. We appreciated the opportunity to begin the conversation with the Honda entities. I am writing to follow up on a few of the items we discussed.

- 1) Description of Honda entities: We appreciate any information you can provide in writing on the various Honda entities and their functions. This will help us better understand which entities have responsive information in the Honda corporate family (or whether information may lie with another entity, etc.).
- 2) DOJ productions: We appreciate Honda's willingness to provide the DOJ productions for wire harnesses, anti-vibration rubber parts, and bearings. You mentioned that you were seeking approval from the DOJ with respect to production of that information. The stays in those cases have been lifted. Are you just seeking to confirm that



the stay has been lifted or are there other items which need to be clarified with the DOJ? Please let us know if we can provide you with any further information or clarification.

- 3) Production: When Honda is ready to make an initial production (DOJ or from search of Honda entities), it would be very helpful to touch base on the actual production logistics, as well as format, custodians, and metadata fields to be produced.

We know that you are in the period of responding to the subpoena. We hope to speak with you further once Honda has had a chance to respond. Please feel free to contact us in the meantime with any questions or concerns.

Kind regards,  
Ronnie

**Ronnie Spiegel** | Partner  
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**From:** heather.choi@bakerbotts.com  
**Sent:** Wednesday, January 27, 2016 8:53 AM  
**To:** Ronnie Spiegel  
**Cc:** kendall.millard@btlaw.com  
**Subject:** OEM Subpoena

Ronnie,

I would like to add an agenda item to Friday's call regarding OEM subpoena issues. Kendall Millard (new to the case and representing a defendant in the shock absorbers case) and I have identified at least 3 more recent parts that are not covered by the current subpoena: shock absorbers, automotive hoses, and automotive brake hoses. I anticipate that this will continue to be an issue as additional products are added to the MDL. Do you know whether the serving parties have discussed this issue in the past? If not, we should consider how to address the addition of new parts.

Thank you,  
Heather

**Heather Souder Choi**  
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**From:** heather.choi@bakerbotts.com  
**Sent:** Wednesday, January 27, 2016 3:09 PM  
**To:** Ronnie Spiegel  
**Cc:** kendall.millard@btlaw.com  
**Subject:** Re: OEM Subpoena

Thanks Ronnie. I'm happy to raise the issue on the call.

On Jan 27, 2016, at 1:47 PM, Ronnie Spiegel <[ronnie@hbsslaw.com](mailto:ronnie@hbsslaw.com)> wrote:

Hi Heather,

I am happy to add your item to the agenda for Friday. I don't think there has been much discussion to date re new parts and how to address them with respect to the subpoena. I believe the intention of the coordination order would be to have these parts included in our discovery effort. Can you plan to lead the discussion this point on Friday?

Thanks,

Ronnie

Ronnie Spiegel | **Hagens Berman Sobol Shapiro LLP** | Direct: (206) 268-9343

---

**From:** [heather.choi@bakerbotts.com](mailto:heather.choi@bakerbotts.com) [<mailto:heather.choi@bakerbotts.com>]

**Sent:** Wednesday, January 27, 2016 6:53 AM

**To:** Ronnie Spiegel

**Cc:** [kendall.millard@btlaw.com](mailto:kendall.millard@btlaw.com)

**Subject:** OEM Subpoena

Ronnie,

I would like to add an agenda item to Friday's call regarding OEM subpoena issues. Kendall Millard (new to the case and representing a defendant in the shock absorbers case) and I have identified at least 3 more recent parts that are not covered by the current subpoena: shock absorbers, automotive hoses, and automotive brake hoses. I anticipate that this will continue to be an issue as additional products are added to the MDL. Do you know whether the serving parties have discussed this issue in the past? If not, we should consider how to address the addition of new parts.

Thank you,

Heather

**Heather Souder Choi**

Senior Associate

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**From:** Ronnie Spiegel <ronnie@hbsslaw.com>  
**Sent:** Friday, February 5, 2016 10:12 AM  
**To:** heather.choi@bakerbotts.com  
**Subject:** RE: Weekly call and agenda

Ok, thanks.

Ronnie Spiegel | **Hagens Berman Sobol Shapiro LLP** | Direct: (206) 268-9343

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**From:** heather.choi@bakerbotts.com [mailto:heather.choi@bakerbotts.com]  
**Sent:** Friday, February 05, 2016 2:52 AM  
**To:** Ronnie Spiegel  
**Subject:** Re: Weekly call and agenda

Ronnie,

I am traveling today and won't be able to make today's call. I'm happy to follow up with you early next week assuming (1) EPPs are drafting the brief and (2) the group decides to insert some language.

Thank you,  
Heather

Sent from my iPhone

On Feb 4, 2016, at 5:27 PM, Ronnie Spiegel <[ronnie@hbsslaw.com](mailto:ronnie@hbsslaw.com)> wrote:

Please see below re tomorrow's weekly call.

Call-in:

1-855-749-4750

Passcode: 926 125 245

Agenda:

- 1) Motion to compel
  - a. Schedule has been confirmed 2/19 (opp); 3/4 (reply) – pending stip
  - b. EPPs would like to take first draft on reply; please confirm
  - c. Format for oppositions and page limits?
- 2) Independent distributor letter/subpoenas
- 3) Truck and equipment subpoenas
- 4) Meet and confers
  - a. Isuzu (Krista Anderson)
  - b. Mazda (Rachel Osborn)
- 5) Other communications with OEMs
  - a. Toyota
  - b. Hyundai/Kia
- 6) SSE differences

- a. How do we want to handle OEMs that are now not in complete alignment with summit group?
- 7) Productions
  - a. Isuzu production
  - b. Honda production
- 8) New cases (Heather Choi)
  - a. Are we/how are we integrating new cases that have been filed after the subpoenas were served?
- 9) Other

Best,  
Ronnie

**Ronnie Spiegel** | Partner  
**Hagens Berman Sobol Shapiro LLP**  
1918 Eighth Ave Suite 3300 - Seattle, WA 98101  
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**From:** Ronnie Spiegel <ronnie@hbsslaw.com>  
**Sent:** Monday, April 25, 2016 12:40 PM  
**To:** 'OEM\_subpoenas@lists.susmangodfrey.com'  
**Subject:** FW: OEM contact list

Hi All,

As a follow up to my email on Friday, I am drafting an email to go to the OEM counsel on EPPs' responsibility list (Toyota, Honda, Hyundai/Kia). I think it would be helpful to propose actual dates in the email, and then ask for a phone call to further discuss dates and location. I know that the proposed dates will probably not keep given the expected objections/appeals, but I wanted to run them by the group, in case, before proposing them. I am planning to propose:

Week of 5/23  
Week of 5/30

Once the weeks are proposed, we can have further negotiations, if they are willing, re the exact two days within each week that work best, and location. Please confirm if your group is ageeable to proposing these two weeks to start. We hope to get these emails out or make initial calls to counsel today. We hope those responsible for the other OEM families can also reach out to their assigned OEMs today or tomorrow.

Thanks,  
Ronnie

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**From:** Ronnie Spiegel  
**Sent:** Friday, April 22, 2016 10:14 AM  
**To:** 'OEM\_subpoenas@lists.susmangodfrey.com'  
**Subject:** OEM contact list

Counsel,

As a follow up to our call and to Pat's good suggestion that we reach out to each OEM group re scheduling and/or possible negotiation early next week, here is the list of the OEMs, OEM contact counsel, relevant entities, and previously-assigned point people. If there are any changes to the point people, please advise. Please note, some OEM families are listed twice to reflect the split of entities and counsel.

Perhaps, we can work on drafting some common language to use in our initial contacts with these entities. Also, if we are going to approach regarding scheduling depositions, do we want to have a list of pre-set dates to propose?

Best regards,  
Ronnie

OEM Family	OEM Counsel	Entities	Serving Party Point People
Chrysler/Fiat	Colin R. Kass Proskauer 1001 Pennsylvania Avenue, NW Washington, DC 20004-2533 T: (202) 416-6890 F: (202) 416-6899 C: (571) 332-7934 <a href="mailto:ckass@proskauer.com">ckass@proskauer.com</a>	FCA US LLC Fiat Chrysler Finance North America, Inc.	Sheldon Klein Katie Van Dyck
Daimler/Mercedes	Dominic Surprenant Quinn Emanuel 865 South Figueroa Street, 10th Floor Los Angeles, California 90017 310.699.1600 Cell 213.443.3166 Office (direct line) <a href="mailto:ds@quinnemanuel.com">ds@quinnemanuel.com</a>	Daimler North America Corp. (MI) Daimler North America Corp. (NJ) Daimler Purchasing Coordination Corp. Daimler Trucks North America LLC Daimler Vans Manufacturing LLC Daimler Vans USA LLC Freightliner Custom Chassis Corp. Mercedes-Benz Advanced Design of NA, Inc. Mercedes-Benz Credit Corp. Mercedes-Benz Financial Services USA LLC Mercedes-Benz R&D NA, Inc. (CA) Mercedes-Benz R&D NA, Inc. (MI) Mercedes-Benz International, Inc. Mercedes-Benz USA LLC Mitsubishi Fuso Truck of America, Inc. Thomas Built Buses, Inc. Western Star Trucks Sales, Inc.	David Brownstein Katie Van Dyck Bill Shotzbarger
GM	Adam B. Wolfson Quinn Emanuel Los Angeles 1-213-443-3000 <a href="mailto:adamwolfson@quinnemanuel.com">adamwolfson@quinnemanuel.com</a>	General Motors Co. General Motors Financial Co., Inc. General Motors Holdings LLC General Motors LLC	Lawrence Buterman Taylor Asen
Honda	Justina Kahn Sessions Keker & Van Nest LLP 633 Battery Street San Francisco, CA 94111-1809 Tel. (415) 676-2293 (415) 397-7188 <a href="mailto:jsessions@kvn.com">jsessions@kvn.com</a>	American Honda Motor Co., Inc. American Honda Finance Corp. Honda Manufacturing of Indiana, LLC Honda North America, Inc. Honda of America Mfg., Inc. Honda of South Carolina Mfg., Inc. Honda Precision Parts of Georgia, LLC Honda R&D Americas, Inc. Honda Research Institute USA, Inc. Honda Transmission Manufacturing of America, Inc.	Ronnie Spiegel Heather Choi
Hyundai/Kia	Alston & Bird LLP Attn: Peter Kontio and/or Meredith Kingsley 1201 West Peachtree St Atlanta, GA 30309-3424 Office: 404-881-7172 Main: 404-881-7000 Mobile: 404-831-7172 Fax: 404-253-8690 <a href="mailto:peter.kontio@alston.com">peter.kontio@alston.com</a>	Hyundai Motor Manufacturing Alabama, Inc. Hyundai America Technical Center, Inc. Kia Motors Manufacturing Georgia, Inc.	Ronnie Spiegel Jeniphre Breckenridge

Hyundai/Kia	Susan R. Peck Lee, Hong, Degerman, Kang & Waimey A Professional Corporation 3501 Jamboree Road Suite 6000 Newport Beach, California 92660 Telephone: (949) 250-9954 Cell Phone: (949) 302-6347	Kia Motors America, Inc. Hyundai Capital America	Ronnie Spiegel Jeniphrr Breckenridge
Hyundai/Kia	Joseph Ashby Shon Morgan Quinn Emmanuel 865 South Figueroa Street 10th Floor Los Angeles, CA 90017-2543 P (213) 443-3000	Hyundai Motor America Hyundai AutoEver America, LLC	Ronnie Spiegel Jeniphrr Breckenridge
Nissan	Samuel Mendenhall Kimball Anderson Winston & Strawn LLP 35 W. Wacker Drive Chicago, IL 60601-9703 D: +1 (312) 558-5755 F: +1 (312) 558-5700 <a href="mailto:smendenh@winston.com">smendenh@winston.com</a>	Nissan North America, Inc. Nissan Design America, Inc. (Part of NNA) Nissan Technical Center NA, Inc. (Part of NNA) Nissan Diesel America, Inc. Nissan motor Acceptance Corp.	Danielle Garten Katie Van Dyck
Subaru/Fuji Heavy	Michael R. Carroll Ballard Spahr LLP 210 Lake Drive East, Suite 200 Cherry Hill, NJ 08002-1163 Direct 856.761.3452 Fax 856.761.1020 <a href="mailto:carrollm@ballardspahr.com">carrollm@ballardspahr.com</a>   <a href="http://www.ballardspahr.com">www.ballardspahr.com</a>	Subaru of America, Inc. Subaru Leasing Corp. Fuji Heavy Industries U.S.A., Inc.	Molly Crabtree Taylor Asen
Subaru/Fuji Heavy	Kimberly C. Metzger Ice Miller One American Square Suite 2900 Indianapolis, IN 46282-0200 317-236-2296 (direct) <a href="mailto:kimberly.metzger@icemiller.com">kimberly.metzger@icemiller.com</a>	Subaru of Indiana Automotive, Inc.	Molly Crabtree Taylor Asen
Toyota	Michael (Mike) Schaper, Esq. David Noland Debevoise & Plimpton LLP 919 Third Avenue New York, NY 10022 Tel: (212) 909-6737 Fax: (212) 909-6836 <a href="mailto:mschaper@debevoise.com">mschaper@debevoise.com</a> <a href="mailto:dbnoland@debevoise.com">dbnoland@debevoise.com</a>	Toyota Motor Sales, USA, Inc. Toyota Motor Engineering & Manufacturing NA, Inc.	Ronnie Spiegel Jeniphrr Breckenridge

1918 Eighth Ave Suite 3300 - Seattle, WA 98101

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[ronnie@hbsslaw.com](mailto:ronnie@hbsslaw.com) | [www.hbsslaw.com](http://www.hbsslaw.com) | [HBSS Blog](#)



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**From:** heather.choi@bakerbotts.com  
**Sent:** Friday, March 16, 2018 4:22 PM  
**To:** Ronnie Spiegel  
**Cc:** Katherine.Dutcher@bakerbotts.com; fshort@SusmanGodfrey.com; Reiss, William V.; Gore, Robert M.; Lissacharoff@susmangodfrey.com; klein@butzel.com; evelyn@cuneolaw.com; WShotzbarger@duanemorris.com  
**Subject:** Re: Recap of Today's Weekly OEM Discovery Call

Ronnie,

Thank you very much.

**Heather Souder Choi**

Partner

Baker Botts L.L.P.

[heather.choi@bakerbotts.com](mailto:heather.choi@bakerbotts.com)

T [+1.202.639.7859](tel:+1.202.639.7859)

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[USA](#)

On Mar 16, 2018, at 5:17 PM, Ronnie Spiegel <[ronnie@hbsslaw.com](mailto:ronnie@hbsslaw.com)> wrote:

Hi Heather,

The point people are listed below next to each OEM title. I am cc'ing them all here (as well as the others who are on the teams), so that all will now have your message.

Best,

Ronnie

Ronnie Spiegel | **Hagens Berman Sobol Shapiro LLP** | Direct: (206) 268-9343

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**From:** [heather.choi@bakerbotts.com](mailto:heather.choi@bakerbotts.com) <[heather.choi@bakerbotts.com](mailto:heather.choi@bakerbotts.com)>

**Sent:** Friday, March 16, 2018 2:08 PM

**To:** Ronnie Spiegel <[ronnie@hbsslaw.com](mailto:ronnie@hbsslaw.com)>; [Katherine.Dutcher@bakerbotts.com](mailto:Katherine.Dutcher@bakerbotts.com)

**Subject:** Re: Recap of Today's Weekly OEM Discovery Call

Ronnie,

Baker Botts represents Toyoda Gosei in the OSS case. Can you let us know who the point people are for OEM discovery for each of the OEMs? We would like to make sure we have someone on each of the individual OEM calls and are on the correspondence.

Thank you

Heather

**Heather Souder Choi**

Partner

Baker Botts L.L.P.

[heather.choi@bakerbotts.com](mailto:heather.choi@bakerbotts.com)

T [+1.202.639.7859](tel:+1.202.639.7859)

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[USA](#)

On Mar 16, 2018, at 5:04 PM, Ronnie Spiegel <[ronnie@hbsslaw.com](mailto:ronnie@hbsslaw.com)> wrote:

Counsel,

To help us all keep track of all the moving pieces, here is a quick summary of status and items due for each OEM, and other cost and scheduling items. The point person for each OEM is also listed for your reference.

- 1) FCA (Sheldon Klein)
  - a. FCA provided list of upstream suppliers. Parties need to get back to FCA with our choices. The Parties will get back to each other by Tuesday, 3/20, with their respective choices.
  - b. Parties need to get back to GM with the list of suppliers and then draft letter to GM re production schedule and expectation that production go quickly.
- 2) GM (Floyd Short)
  - a. Floyd short working on terms of stip with GM counsel. Stip needs to be finalized.
  - b. Parties need to review GM commodity codes list and figure out which ones pertain to OSS, and then give the collective agreed list back to GM counsel.
- 3) Honda (Evelyn Li)
  - a. We had a call with Honda counsel. Honda counsel was checking on whether OSS production can be accomplished and on what timeline. Honda counsel asked if the parties could put in writing exactly the items we are seeking at this stage (which is just what is in the Honda Order). Parties sent Honda counsel a letter, and it is pending.
- 4) Nissan (Will Reiss)
  - a. Parties had a call with Nissan counsel (Paul Cauley) on 3/16. Parties relayed the message that we are now seeking OSS. Paul said he would check with Nissan to get the status re how long it might take to prepare production for OSS-specific categories. Next call was set for 3/29 to follow up.
- 5) SIA (Lucas Isacharoff)
  - a. The Parties had a call with SIA counsel, and Kim Metzger is checking on agreement to produce OSS, and a potential timeline.
- 6) SOA (Lucas Isacharoff)
  - a. Finalizing letter re expert handling of SOA data. Defendants will get back re their potential edits to current draft in the next few days.
  - b. Costs must be paid before SOA will produce.
  - c. Parties need to let Neal Walters know if they want a masked set of data prepared for attorneys to view.
- 7) Toyota (Will Reiss)



- a. The Parties had a call with Toyota counsel. Toyota is checking on conversion to OSS and timeline. Parties sent a letter to Toyota asking for a commitment to produce, and to set a schedule in quick order. Waiting to hear back from Mike Schaper.
- 8) Costs
  - a. EPPs will draft and circulate potential cost-sharing agreement between the Parties. Other Parties will review and edit re the 70% split of production costs.
- 9) Setting Production Schedule with Each OEM – Letter to each OEM
  - a. Each OEM group should draft letter to be sent to each OEM, to tie up any issues and to push for a production schedule in writing.

Best,

Ronne

**Ronnie Spiegel** | Partner

**Hagens Berman Sobol Shapiro LLP**

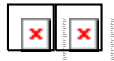
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**From:** heather.choi@bakerbotts.com  
**Sent:** Wednesday, March 28, 2018 1:41 PM  
**To:** Ronnie Spiegel; evelyn@cuneolaw.com; Gore, Robert M.; Reiss, William V.; klein@butzel.com; Milder, Tai S.; fshort@SusmanGodfrey.com; Lissacharoff@susmangodfrey.com; ecastillo@cpmlegal.com; mark.miller@bakerbotts.com  
**Subject:** RE: Auto Parts Litigation - FCA Production

Ronnie,  
I'm copying my partner, Mark Miller. Thank you for the EPP choices. I know that other OEMs are compiling cost estimates for the serving parties. Do we have that information from FCA? My apologies if this has already been discussed, but this information is important to defendants.

Thank you,  
Heather

**Heather Souder Choi**

Partner

Baker Botts L.L.P.

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F +1.202.508.9305

M +1.404.944.9680

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USA



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**From:** Ronnie Spiegel [mailto:[ronnie@hbsslaw.com](mailto:ronnie@hbsslaw.com)]

**Sent:** Wednesday, March 28, 2018 1:40 PM

**To:** Evelyn Li (evelyn@cuneolaw.com) ; Gore, Robert M. ; Reiss, William V. ; klein@butzel.com; Choi, Heather ; Milder, Tai S. ; Floyd G. Short ; Lucas Issacharoff ; Elizabeth Castillo

**Subject:** FW: Auto Parts Litigation - FCA Production

FCA Team,

We need to get back to FCA (quickly) on the list of OSS suppliers. EPPs' choices are indicated below, in the top grouping. Please confirm if you agree to ask FCA for the top 7 (in yellow), or if you have changes to the list. Please let us know no later than EOB tomorrow. Heather and Sheldon, I am not sure if there is anyone else that should be included for defendants. If I have missed anyone, please advise (and please forward this email).

Thanks,

Ronnie

EPPs want production for the following OSS suppliers:

AUTOLIV ASP INC

TRW AUTOMOTIVE INC

KEY SAFETY RESTRAINT SYSTEMS INC

TAKATA CORPORATION

ROBERT BOSCH GMBH

CONTINENTAL AG

**KS CENTOCO WHEEL CORPORATION**

EPPs do not seek production for the OSS suppliers below:

MAGNA INTERNATIONAL  
GRAND RAPIDS PLASTICS INC  
DELPHI AUTOMOTIVE SYSTEMS  
VALEO S A  
HELLA KG HUECK & COMPANY

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**From:** Munkittrick, David A. <[DMunkittrick@proskauer.com](mailto:DMunkittrick@proskauer.com)>

**Sent:** Tuesday, March 6, 2018 7:24 PM

**To:** Ronnie Spiegel <[ronnie@hbsslaw.com](mailto:ronnie@hbsslaw.com)>; Kass, Colin <[CKass@proskauer.com](mailto:CKass@proskauer.com)>

**Cc:** Evelyn Li ([evelyn@cuneolaw.com](mailto:evelyn@cuneolaw.com)) <[evelyn@cuneolaw.com](mailto:evelyn@cuneolaw.com)>; Shotzbarger, William <[WShotzbarger@duanemorris.com](mailto:WShotzbarger@duanemorris.com)>; 'Gore, Robert M.' <[rgore@RobinsKaplan.com](mailto:rgore@RobinsKaplan.com)>; 'Reiss, William V.' <[WReiss@RobinsKaplan.com](mailto:WReiss@RobinsKaplan.com)>; Klein, Sheldon <[klein@butzel.com](mailto:klein@butzel.com)>

**Subject:** RE: Auto Parts Litigation - FCA Production

Ronnie / Sheldon,

We have inquired with FCA's buyers as to suppliers for OSS. The list is below:

KEY SAFETY RESTRAINT SYSTEMS INC  
DELPHI AUTOMOTIVE SYSTEMS  
VALEO S A  
CONTINENTAL AG  
KS CENTOCO WHEEL CORPORATION  
TAKATA CORPORATION  
AUTOLIV ASP INC  
GRAND RAPIDS PLASTICS INC  
MAGNA INTERNATIONAL  
TRW AUTOMOTIVE INC  
ROBERT BOSCH GMBH  
HELLA KG HUECK & COMPANY

Please let us know the suppliers for which you would like FCA to pull purchase and RFQ data.

Best,

David

**David Munkittrick**

Attorney at Law

[Proskauer](#)

Eleven Times Square  
New York, NY 10036-8299  
d 212.969.3226  
f 212.969.2900

[dmunkittrick@proskauer.com](mailto:dmunkittrick@proskauer.com)

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**From:** Ronnie Spiegel [[mailto:ronnie@hbsslaw.com](mailto:mailto:ronnie@hbsslaw.com)]

**Sent:** Tuesday, February 13, 2018 5:38 PM

**To:** Munkittrick, David A.; Kass, Colin

**Cc:** Evelyn Li ([evelyn@cuneolaw.com](mailto:evelyn@cuneolaw.com)); Shotzbarger, William; 'Gore, Robert M.'; 'Reiss, William V.'; Klein, Sheldon

**Subject:** RE: Auto Parts Litigation - FCA Production

To confirm, our time for the call will be 1 pm Pacific/4 pm Eastern time tomorrow, Wednesday 2/14.

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**From:** Ronnie Spiegel  
**Sent:** Tuesday, February 13, 2018 2:36 PM  
**To:** 'Munkittrick, David A.' <[DMunkittrick@proskauer.com](mailto:DMunkittrick@proskauer.com)>; Kass, Colin <[CKass@proskauer.com](mailto:CKass@proskauer.com)>  
**Cc:** Evelyn Li ([evelyn@cuneolaw.com](mailto:evelyn@cuneolaw.com)) <[evelyn@cuneolaw.com](mailto:evelyn@cuneolaw.com)>; Shotzbarger, William <[WShotzbarger@duanemorris.com](mailto:WShotzbarger@duanemorris.com)>; 'Gore, Robert M.' <[rgore@RobinsKaplan.com](mailto:rgore@RobinsKaplan.com)>; 'Reiss, William V.' <[WReiss@RobinsKaplan.com](mailto:WReiss@RobinsKaplan.com)>; Klein, Sheldon <[klein@butzel.com](mailto:klein@butzel.com)>  
**Subject:** RE: Auto Parts Litigation - FCA Production  
Hi David,  
For tomorrow's call we can use the following number (no pin needed):  
1-866-943-4277  
Best,  
Ronnie  
Ronnie Spiegel | **Hagens Berman Sobol Shapiro LLP** | Direct: (206) 268-9343

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**From:** Munkittrick, David A. [<mailto:DMunkittrick@proskauer.com>]  
**Sent:** Tuesday, February 13, 2018 12:02 PM  
**To:** Ronnie Spiegel <[ronnie@hbsslaw.com](mailto:ronnie@hbsslaw.com)>; Kass, Colin <[CKass@proskauer.com](mailto:CKass@proskauer.com)>  
**Cc:** Evelyn Li ([evelyn@cuneolaw.com](mailto:evelyn@cuneolaw.com)) <[evelyn@cuneolaw.com](mailto:evelyn@cuneolaw.com)>; Shotzbarger, William <[WShotzbarger@duanemorris.com](mailto:WShotzbarger@duanemorris.com)>; 'Gore, Robert M.' <[rgore@RobinsKaplan.com](mailto:rgore@RobinsKaplan.com)>; 'Reiss, William V.' <[WReiss@RobinsKaplan.com](mailto:WReiss@RobinsKaplan.com)>; Klein, Sheldon <[klein@butzel.com](mailto:klein@butzel.com)>  
**Subject:** RE: Auto Parts Litigation - FCA Production  
Ronnie,  
We are available at 1pm PST / 10am EST tomorrow. Will you circulate a dial-in?  
Thanks,  
David  
**David Munkittrick**  
Attorney at Law

[Proskauer](#)  
Eleven Times Square  
New York, NY 10036-8299  
d 212.969.3226  
f 212.969.2900

[dmunkittrick@proskauer.com](mailto:dmunkittrick@proskauer.com)

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**From:** Ronnie Spiegel [<mailto:ronnie@hbsslaw.com>]  
**Sent:** Tuesday, February 13, 2018 2:19 PM  
**To:** Munkittrick, David A.; Kass, Colin  
**Cc:** Evelyn Li ([evelyn@cuneolaw.com](mailto:evelyn@cuneolaw.com)); Shotzbarger, William; 'Gore, Robert M.'; 'Reiss, William V.'; Klein, Sheldon  
**Subject:** Auto Parts Litigation - FCA Production  
Colin and David,  
I am hoping we can set up a time to discuss FCA's production in the auto parts cases. Do you have time tomorrow, 2/14, either at 1 pm Pacific or 2 pm Pacific for a call? Please advise, or let us know other times that will work.  
Best regards,  
Ronnie  
**Ronnie Spiegel** | Partner  
**Hagens Berman Sobol Shapiro LLP**  
1918 Eighth Ave #3300 - Seattle, WA 98101

Direct: (206) 268-9343

[ronnie@hbsslaw.com](mailto:ronnie@hbsslaw.com) | [www.hbsslaw.com](http://www.hbsslaw.com) | [HBSS Blog](#)

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